

STATE OF SOUTH CAROLINA

(Caption of Case)

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

Application of Alpine Utilities, Inc. for  
adjustment of rates and charges for the  
provision of sewer service and the  
establishment of additional rates and  
charges

DOCKET  
NUMBER: 2008 - 190 - S

(Please type or print)

Submitted by: John M.S. Hoefer

SC Bar Number: 2549

Telephone: 803-252-3300

Fax: 803-771-2410

Address: Post Office Box 8416  
Columbia, SC 29202

Other:

Email: jhoefer@willoughbyhoefer.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda  
expeditiously

☒ Other:

| INDUSTRY (Check one)                                 | NATURE OF ACTION (Check all that apply)            |  |  |  |
|--|--|--|--|--|
| <input type="checkbox"/> Electric                    | <input type="checkbox"/> Affidavit                 | <input type="checkbox"/> Letter                            | <input type="checkbox"/> Request                   |  |
| <input type="checkbox"/> Electric/Gas                | <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |  |
| <input type="checkbox"/> Electric/Telecommunications | <input checked="" type="checkbox"/> Answer         | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation |  |
| <input type="checkbox"/> Electric/Water              | <input type="checkbox"/> Appellate Review          | <input checked="" type="checkbox"/> Objection              | <input type="checkbox"/> Resale Agreement          |  |
| <input type="checkbox"/> Electric/Water/Telecom.     | <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |  |
| <input type="checkbox"/> Electric/Water/Sewer        | <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |  |
| <input type="checkbox"/> Gas                         | <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |  |
| <input type="checkbox"/> Railroad                    | <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |  |
| <input checked="" type="checkbox"/> Sewer            | <input type="checkbox"/> Complaint                 | <input type="checkbox"/> Petition to Intervene             | <input type="checkbox"/> Return to Petition        |  |
| <input type="checkbox"/> Telecommunications          | <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |  |
| <input type="checkbox"/> Transportation              | <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |  |
| <input type="checkbox"/> Water                       | <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |  |
| <input type="checkbox"/> Water/Sewer                 | <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |  |
| <input type="checkbox"/> Administrative Matter       | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |  |
| <input type="checkbox"/> Other: _____                | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |  |
|  | <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |  |

Print Form

Reset Form

**WILLOUGHBY & HOEFER, P.A.**

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL  
ELIZABETH ZECK\*  
BENJAMIN P. MUSTIAN  
MICHAEL R. BURCHSTEAD

\*ALSO ADMITTED IN TX

June 30, 2008

AREA CODE 803  
TELEPHONE 252-3300  
TELECOPIER 256-8062

TRACEY C. GREEN  
SPECIAL COUNSEL

**VIA HAND-DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk/Administrator  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Application of Alpine Utilities, Inc. for Adjustment of Rates and Charges for the  
Provision of Sewer Service and Establishment of Additional Rates and Charges;  
Docket No. 2008-190-S

Dear Mr. Terreni:

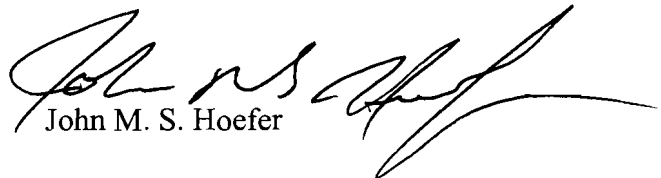
Enclosed for filing on behalf of Alpine Utilities, Inc. are the original and ten (10) copies of its Answer in Opposition and Objection to the Petition to Intervene of Jim and Carolyn Cook in the above-referenced matter. By copy of this letter, I am serving a copy of these documents upon the Office of Regulatory Staff and enclose a Certificate of Service to that effect.

I would appreciate your acknowledging receipt of this Answer by date-stamping the extra copy that is enclosed and returning the same to me via our courier.

If you have any questions, or if you need any additional information, please do not hesitate to contact me.

Sincerely,

**WILLOUGHBY & HOEFER, P.A.**

  
John M. S. Hoefer

JMSH/cf

Enclosures

cc: Nanette S. Edwards, Esquire (via electronic and first class mail)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2008-190-S**

RECEIVED  
2008 JUN 19 11:01  
SC PUBLIC SERVICE  
COMMISSION

**IN RE:**

Application of Alpine Utilities,  
Inc. for adjustment of rates and  
charges for the provision of sewer  
service and the establishment of  
additional rates and charges.

**APPLICANT'S ANSWER IN  
OPPOSITION AND OBJECTION TO  
PETITION TO INTERVENE**

Applicant, Alpine Utilities, Inc. ("Alpine" or "Company"), pursuant to 26 S.C. Code Ann. Regs. R. 103-825A.3 (Supp. 2007) and R.103-826 (1976, as amended), by and through its undersigned counsel, submits the within Answer in Opposition and Objection to the Petition to Intervene ("Petition") of Jim Cook and Carolyn Cook (collectively, "Petitioners") dated June 19, 2008, in the above-captioned matter. In that regard, Alpine would respectfully show unto this Honorable Commission as follows:

1. Applicant answers and objects to the Petition on the ground that the Petitioners have no standing to intervene in the matter because neither of them are customers of the Company nor, upon information and belief, do they own "the duplexes ... on Kay Street, Columbia, SC" referred to in the Petition to Intervene. Applicant asserts that the duplexes situated on Kay Street referred to in the Petition and served by Applicant, which are known as the "Windridge Apartments", are owned by Happy Rabbit, a South Carolina Limited Partnership (the "LP"). Attached hereto and incorporated herein by reference as Exhibit "A" is a copy of a deed for the real property comprising Windridge Apartments from Carolyn Lucas Cook to the LP

dated December 29, 2005, and recorded in the real estate records of Richland County in Book R1138 at Page 94. Moreover, neither of the Petitioners has an account with Applicant; to the contrary, the account serving said duplexes is listed under “Windridge Apartments” and not the Petitioners. Attached hereto and incorporated herein by reference as Exhibit “B” is a copy of the Company’s most recent bill for service to the Windridge Apartments. The Company submits that the customer for its services at the Windridge Apartments is therefore the LP and, thus, that neither of the Petitioners is a “customer” of the Company as defined in R. 103-502.4 (Supp. 2007). The Petitioners therefore lack standing and any right or interest to intervene in the matter as required by R. 103-825A.3(a).

2. To the extent that the Petition purports to be filed on behalf of “the tenants of the duplexes...on Kay Street”, it would be improperly before the Commission as it would constitute the product of the unauthorized practice of law. Pursuant to 26 S.C. Code Ann. R. 103-804(O), the Petition is a pleading. Assuming that the tenants have standing to challenge the rate increase (which is disputed in view of the fact that the LP is the customer and no tenant is a customer of the Company), Alpine submits that the Petitioners are not licensed as attorneys or otherwise authorized to practice law in South Carolina and, therefore, are unable to lawfully prepare or file pleadings on behalf of the tenants. *See Roberts v. LaConey*, 375 S.C. 97, 650 S.E.2d 474 (2007). Further, 26 S.C. Code Ann. R.103-804.T (Supp. 2007) permits persons to appear in a representative capacity only in the following instances:

- (a) An individual may represent himself or herself in any proceeding before the Commission.
- (b) An attorney authorized to practice law in the State of South Carolina may represent a party in any proceeding before the Commission.

Accordingly, Petitioners are further barred from preparing and filing a petition to intervene on behalf of the tenants under Commission rules.

3. Similarly, even if the Petition were to be liberally construed as having been filed on behalf of the Company's customer for Windridge Apartments (i.e., the LP), the Petition would nonetheless be improperly before the Commission as individuals may not represent non-individuals in proceedings before the Commission. *See* Order No. 2003-550, Docket No. 2003-162-T, September 8, 2003.<sup>1</sup> *See also In re Unauthorized Practice of Law*, 309 S.C. 304, 422 S.E.2d 123(1992).

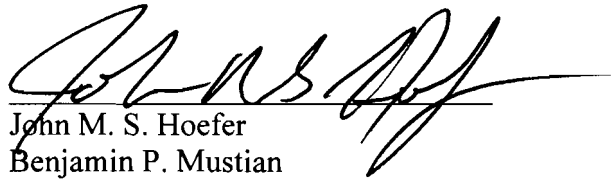
4. Alpine denies that the requested rate relief is "unreasonable" or "will severely impact the tenants" at Windridge Apartments. To the extent the Petition alleges any other or further matter, same is denied and strict proof thereof is demanded.

WHEREFORE, having fully set forth its Answer and Objection, the Company requests that the Petition to Intervene be denied and that such other and further relief be granted by the Commission to the Company as is just and proper.

[SIGNATURE PAGE FOLLOWS]

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<sup>1</sup> In recognizing the limitations upon representation of non-individual interests by laypersons under a predecessor version of R.103-804.T, the Commission stated in this order that "[w]e agree ... that the Petitions to Intervene ... should be dismissed. The Petitions to Intervene were signed by persons who are not attorneys. The South Carolina Public Service Commission has not, by regulation, authorized persons not licensed to practice law in South Carolina, to appear and represent clients before the Commission. The "practice of law embraces the preparation of pleadings, and other papers incident to actions and special proceedings..." [citation omitted]. A pleading includes a "petition" as defined by [Commission regulations]. Therefore, Petitions to Intervene which are filed on behalf of someone other than an individual must be signed by an attorney."



John M. S. Hoefer

Benjamin P. Mustian

**Willoughby & Hoefer, P.A.**

Post Office Box 8416

Columbia, South Carolina 29202-8416

803-252-3300

[jhoefer@willoughbyhoefer.com](mailto:jhoefer@willoughbyhoefer.com)

[bmustian@willoughbyhoefer.com](mailto:bmustian@willoughbyhoefer.com)

*Attorneys for Alpine Utilities, Inc.*

Columbia, South Carolina  
This 30th day of June, 2008

**Grantee's Address:**  
608 South Lake Road  
Columbia, SC 29223

**STATE OF SOUTH CAROLINA)**  
**COUNTY OF RICHLAND )**

**DEED**

**KNOW ALL PERSONS BY THESE PRESENTS**, that the undersigned grantor CAROLYN LUCAS COOK (hereinafter referenced "Grantor"), for and in consideration of the sum of Five (\$5.00) Dollars and acquisition of interest in a family limited partnership, without other consideration, to the Grantor in hand paid at and before the sealing and delivery of these presents, by the grantee **HAPPY RABBIT**, a South Carolina Limited Partnership (hereinafter referenced "Grantee"), the receipt and sufficiency of said consideration being hereby acknowledged, has granted, bargained, sold and conveyed, and by these Presents does grant, bargain, sell and convey, unto the Grantee and Grantee's successors and assigns, all right, title and interest in and to the premises described upon Exhibit "A", attached hereto and incorporated herein by reference.

The grant and conveyance of the said premises being made specifically subject to that certain Mortgage from Grantor to Carolina First Bank recorded in the Office of ROD for Richland County on December 9, 2005, in Record Book 1129 at page 2142 and that certain Assignment of Rents and Leaser from Grantor to Carolina First Bank recorded in said ROD Office on December 9, 2005, in Record Book 1129 at page 2150. Acceptance of delivery and recordation of this Deed constitutes Grantee acknowledgment and affirmative assumption of the terms and obligations of both said lien instruments.

**TOGETHER** with all and singular, the rights, members, hereditaments and appurtenances to the said premises belonging or in anywise incident and appertaining.

**THIS CONVEYANCE** is made subject to easements, conditions and restrictions of record, including matters appearing on plats of record affecting the premises.

**TO HAVE AND TO HOLD** all and singular the premises before mentioned unto the said Grantee and Grantee's successors and assigns forever.

**AND GRANTOR DOES HEREBY BIND GRANTOR** and Grantor's heirs, successors and assigns to warrant and forever defend all and singular the said premises unto Grantee and Grantee's successors and assigns against Grantor and Grantor's heirs, successors and assigns and against all others whosoever lawfully claiming or to claim the same, or any part thereof.

**WITNESS** Grantor's hand and seal this <sup>21<sup>th</sup></sup> day of December, 2005.

Book 1138-94

2006000007 01/03/2006 09:35:36.803

Deed

Fee: \$40.00 County Tax: \$0.00

State Tax: \$0.00



2006000007 John G. Morris

Richland County ROD

Richland County ROD

Richland County Auditor Paul Brawley 2007

WITNESSES:

Remise Hutcherson[Signature]Carolyn Lucas Cook  
CAROLYN LUCAS COOK

STATE OF SOUTH CAROLINA)

PROBATE

COUNTY OF RICHLAND )

PERSONALLY APPEARED BEFORE ME the undersigned witness, who being duly sworn deposes and says that he/she witnessed execution of the foregoing deed by the Grantor and that said execution was also witnessed by the second witness whose name appears upon the face of the said deed.

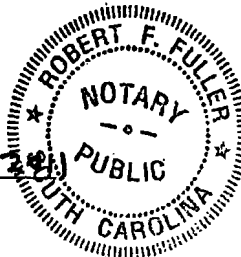
Remise Hutcherson

Witness Signature.

SWORN TO BEFORE ME THIS 29<sup>th</sup>  
DAY OF December, 2005 5.

[Signature] [Seal]

Notary Public for South Carolina

My Notarial Commission Expires: 10/01/2011

Richland County ROD

Richland County Auditor Paul Brawley 2007



**EXHIBIT "A"**

All those certain piece, parcels or lots of land, with the improvements thereon, situate, lying and being in the County of Richland, State of South Carolina, the same being shown and delineated as Lots 1, 2, 3, 4, and 5 on a Plat prepared for Windridge, A Partnership by James F. Polson dated September 4, 1984 and recorded in the Office of the R.M.C. for Richland County, South Carolina in Plat Book 50, at page 1015.

**ALSO:**

All those certain piece, parcels or lots of land, with the improvements thereon, situate, lying and being in the County of Richland, State of South Carolina, the same being shown and delineated as Lots 6, 7, 8, 9, 10, 11 and 12 on a Plat prepared for Windridge, A Partnership by James F. Polson dated October 29, 1984 and recorded in the Office of the R.M.C. for Richland County, South Carolina in Plat Book 50, at page 1763.

**ALSO:**

All those certain piece, parcels or lots of land, with the improvements thereon, situate, lying and being in the County of Richland, State of South Carolina, the same being shown and delineated as Lots 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 and 23 on a Plat prepared for Windridge, A Partnership by James F. Polson dated November 12, 1984 and recorded in the Office of the R.M.C. for Richland County, South Carolina in Plat Book 50, at page 1580.

**DERIVATION:** Deed from Windridge Limited Partnership to Carolyn Lucas Cook, recorded in the Richland County Register of Deeds Office on November 12, 1999, Record Book 0360 at page 971.

TMS NO.: 0612-02-28

Richland County Auditor Paul Brawley 2007

Richland County ROD

STATE OF SOUTH CAROLINA)  
COUNTY OF RICHLAND )

## AFFIDAVIT

Page 1 of 2

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the ~~information~~ <sup>information</sup> on this affidavit and I understand such information.

2. The property being transferred is located at 3300 Kay Street, Columbia, S.C. 29210  
bearing Richland County Tax Map Number 0612-02-28, was transferred  
by Carolyn Lucas Cook  
to Happy Rabbit, a S.C. Limited Partnership on December 29, 2005.

3. Check one of the following: The deed is

- (a) \_\_\_\_\_ subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
- (b) \_\_\_\_\_ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
- (c) X \_\_\_\_\_ exempt from the deed recording fee because (See Information section of affidavit):  
Exempt classification #8, transfer for partnership interest only  
(If exempt, please skip items 4 - 7, and go to item 8 of this affidavit)

4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See Information section of this affidavit): Not applicable

- (a) \_\_\_\_\_ The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \_\_\_\_\_.
- (b) \_\_\_\_\_ The fee is computed on the fair market value of the realty which is \_\_\_\_\_.
- (c) \_\_\_\_\_ The fee is computed on the fair market value of the realty as established for property tax purposes which is \_\_\_\_\_.

5. Check Yes \_\_\_\_\_ or No \_\_\_\_\_ to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "Yes," the amount of the outstanding balance of this lien or encumbrance is: Not applicable

6. The deed recording fee is computed as follows: Not applicable

- (a) Place the amount listed in item 4 above here: \_\_\_\_\_
- (b) Place the amount listed in item 5 above here: \_\_\_\_\_  
(If no amount is listed, place zero here.)
- (c) Subtract Line 6(b) from Line 6(a) and place result here: \_\_\_\_\_

7. The deed recording fee due is based on the amount listed on Line 6(c) above and the deed recording fee due is: Not applicable

8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Grantor

Page 2 of 2

9. I understand that a person required to furnish this affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

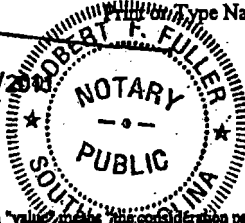
*Carolyn Lucas Cook*  
Responsible Person Connected with the Transaction

SWORN to before me this 29th  
day of December, 2005

Carolyn Lucas Cook

Notary Public for S.C.

My Commission Expires: 10/01/2008



### INFORMATION

Except as provided in this paragraph, the term "value" means the consideration paid or to be paid in money or money's worth for the realty." Consideration paid or to be paid in money's worth includes, but is not limited to, other realty, personal property, stocks, bonds, partnership interest and other intangible property, the forgiveness or cancellation of a debt, the assumption of a debt, and the surrendering of any right. The fair market value of the consideration must be used in calculating the consideration paid in money's worth. Taxpayers may elect to use the fair market value of the realty being transferred in determining fair market value of the consideration. In the case of realty transferred between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, and in the case of realty transferred to a trust or as a distribution to a trust beneficiary, "value" means the realty's fair market value. A deduction from value is allowed for the amount of any lien or encumbrance existing on the land, tenement, or realty before the transfer and remaining on the land, tenement, or realty after the transfer. Taxpayers may elect to use the fair market value for property tax purposes in determining fair market value under the provisions of the law.

Exempted from the fee are deeds:

- (1) transferring realty in which the value of the realty, as defined in Code Section 12-24-30, is equal to or less than one hundred dollars;
- (2) transferring realty to the federal government or to a state, its agencies and departments, and its political subdivisions, including school districts;
- (3) that are otherwise exempted under the laws and Constitution of this State or of the United States;
- (4) transferring realty in which no paid or less is recognized by reason of Section 1061 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (5) transferring realty in order to partition realty as long as no consideration is paid for the transfer other than the interests in the realty that are being exchanged in order to partition the realty;
- (6) transferring an individual grave space at a cemetery owned by a cemetery company licensed under Chapter 55 of Title 39;
- (7) that constitute a contract for the sale of timber to be cut;
- (8) transferring realty to a corporation, a partnership, or a trust in order to become, or as, a stockholder, partner, or trust beneficiary of the entity provided no consideration is paid for the transfer other than stock in the corporation, interest in the partnership, beneficiary interest in the trust, or the increase in value in such stock or interest held by the grantor. However, the transfer of realty from a corporation, a partnership, or a trust to a stockholder, partner, or trust beneficiary of the entity is subject to the fee even if the realty is transferred to another corporation, a partnership, or trust;
- (9) transferring realty from a family partnership to a partner or from a family trust to a beneficiary, provided no consideration is paid for the transfer other than a reduction in the grantor's interest in the partnership or trust. A "family partnership" is a partnership whose partners are all members of the same family. A "family trust" is a trust, in which the beneficiaries are all members of the same family. The beneficiaries of a family trust may also include charitable entities. "Family" means the grantor and the grantor's spouse, parents, grandparents, aunts, brothers, children, stepchildren, grandchildren, and the spouses and lineal descendants of any the above. A "charitable entity" means an entity which may receive deductible contributions under Section 170 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (10) transferring realty in a statutory merger or consolidation from a constituent corporation to the continuing or new corporation;
- (11) transferring realty in a merger or consolidation from a constituent partnership to the continuing or new partnership; and,
- (12) that constitute a corrective deed or a quitclaim deed used to confirm title already vested in the grantee, provided that no consideration of any kind is paid or is to be paid under the corrective or quitclaim deed.

Richard County Auditor Paul Brantley 2007

Richard County ROD

06/19/2008 10:51 FAX

06/19/2008

Account # Type Act Name Type <-----Company Name-----> #Apts  
AAPT-23A AC C WINDRIDGE APARTMENTS 46  
Property Location Mail Address1 C/O MRS. CAROLYN L COOK  
KAY ST,N OF ST. ANDREWS Mail Address2 P. O. BOX 21561  
City COLUMBIA St SC Zip 29221

Phone Num. (803)788-3133 Special Message MONTHLY SEWER SERVICE

Date First Service Tap Fee Date Tap Fee Paid  
02/01/1985 11500.00 07/18/1984

C U R R E N T S T A T U S  
eq. chg. Adjustment Prev. Bal. Late Chg. Bal Due Cur. Pmts. Lst Date  
621.00 0.00 0.00 0.00 0.00 621.00 05/29/2008

Comments 46 APT(23 BLDGS)ESIDE KAY ST/RICH DAVID COOK 608-1517

Last Charge Change Reason Date of Last Change / /  
Reason Account Added Date Account Added / /

Account No. Last Name  
AAPT-23A RIDGE APARTMEN

P A Y M E N T H I S T O R Y  
Previous Last 2nd Previous Last 3rd Previous Last  
Months Payments Date Months Payments Date Months Payments Date  
621.00 04/30/2008 621.00 04/03/2008 1242.00 03/19/2008  
4th Previous Last 5th Previous Last 6th Previous Last  
Months Payments Date Months Payments Date Months Payments Date  
0.00 / / 621.00 01/10/2008 621.00 12/12/2007  
7th Previous Last 8th Previous Last 9th Previous Last  
Months Payments Date Months Payments Date Months Payments Date  
621.00 11/01/2007 621.00 09/26/2007 621.00 09/06/2007  
10th Previous Last 11th Previous Last 12th Previous Last  
Months Payments Date Months Payments Date Months Payments Date  
621.00 08/08/2007 621.00 07/05/2007 621.00 06/13/2007

*Customer account*

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2008-190-S**

IN RE:

Application of Alpine Utilities, Inc.  
for Adjustment of Rates and Charges  
for the Provision of Sewer Service  
and Establishment of Additional Rates  
and Charges.

**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day one (1) copy of the **Applicant's Answer in Opposition and Objection to Petition to Intervene** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Nanette S. Edwards, Esquire  
**Office of Regulatory Staff**  
Post Office Box 11263  
Columbia, South Carolina 29211

*Clark Fancher*

Clark Fancher

Columbia, South Carolina  
This 30<sup>th</sup> day of June, 2008.

RECEIVED  
2008 JUN 30 PM 4:01  
U.S. POSTAL SERVICE  
COLUMBIA, SC 29201